

Patrick J. Murphy, WSB No. 5-1779
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

BCB CHEYENNE LLC d/b/a BISON)	
BLOCKCHAIN, a Wyoming limited liability)	
company,)	
Plaintiff,)	
v.)	Civil Action No. 23-CV-79-ABJ
MINEONE WYOMING DATA CENTER)	
LLC, a Delaware limited liability company;)	
MINEONE PARTNERS LLC, a Delaware)	
limited liability company; TERRA)	
CRYPTO, INC., a Delaware corporation;)	
BIT ORIGIN, LTD, a Cayman Island)	
Company; SONICHASH LLC, a Delaware)	
limited liability company; BITMAIN)	
TECHNOLOGIES HOLDING COMPANY,)	
a Cayman Island Company; BITMAIN)	
TECHNOLOGIES GEORGIA LIMITED, a)	
Georgia corporation; and JOHN DOES 1-18,)	
related persons and companies who control)	
or direct some or all of the named)	
Defendants,)	
Defendants.)	

EXHIBIT A
TO BCB CHEYENNE LLC d/b/a BISON BLOCKCHAIN'S
SUPBOENA DUCES TECUM TO CLEANSARK, INC. IN A CIVIL ACTION

CLEANSARK, INC. is commanded to produce copies of the following documents to
Patrick J. Murphy at WILLIAMS, PORTER, DAY & NEVILLE, P.C. at 159 N. Wolcott Street, Suite

400, Casper, WY 82601, or by emailing the documents to pmurphy@wpdn.net by July 19, 2024 at 4:00 p.m. MDT, as follows:

DEFINITIONS

1. "Document" shall have the full meaning ascribed to it in Rule 34 of the Federal Rules of Civil Procedure and shall include every writing or record of every type and description, including, but not limited to, agreements, contracts, contract files, correspondence, memoranda, publications, pamphlets, promotional materials, studies, books, tables, charts, graphs, schedules, e-mails, text messages, photographs, films, voice recordings, reports, surveys, analyses, journals, ledgers, telegrams, stenographic or handwritten notes, minutes of meetings, transcripts, financial statements, purchase orders, vouchers, invoices, bills of sale, bills of lading, credit and billing statements, checks, manuals, circulars, bulletins, instructions, sketches, diagrams, computer programs, printouts, punch cards, tabulations, logs, telephone records, desk calendars, diaries, appointment books, computer data, tapes, and disks; and includes all drafts or copies of every such writing or record whenever a draft or copy of a document is not an identical copy of the original or where such draft or copy contains any commentary or notes that do not appear on the original.

2. "Communications" shall mean all written, oral, telephonic, electronic, e-mail, text, or other transmittal of words, thoughts, ideas, and images, including, but not limited to, inquiries, discussions, conversations, negotiations, agreements, understandings, meetings, letters, notes, telegrams, advertisements, press releases, publicity releases, trade releases, and interviews.

3. The term "relating to" shall mean directly or indirectly mentioning or describing, comprising, consisting of, referring to, reflecting on, or being in any way logically or factually connected with the matter discussed.

4. The term "North Range" shall mean of, concerning, or relating in any way to the improved real property commonly known as 635 Logistics Drive in the City of Cheyenne, Laramie County, Wyoming 82009 and the related electrical power contracts with Black Hills Energy for the BCIS power (~45 megawatts) and expansion power (~25 megawatts).

5. The term "Campstool" shall mean of, concerning, or relating to the property known as Lot 1 Block 4 Venture Dr., in the City of Cheyenne, Laramie County, Wyoming 82007 and the related electrical power contracts with Black Hills Energy for the BCIS power (~30 megawatts) and expansion power (~30 megawatts).

DOCUMENTS REQUESTED

1. Please produce in native, .eml format, the May 8, 2024 email (including any attachment(s) in native form) that Stephen Cohen sent to Duncan Poe at CleanSpark on May 8, 2024 around 3:57 pm EDT with the subject "Execution Version of PSA."
2. For the time period May 1, 2024 – July 10, 2024, please produce copies of all correspondence CleanSpark, Inc. has received from, or sent to, (a) MineOne Wyoming Data Center LLC, Terra Crypto, Inc., their counsel, and (b) CFIUS, and/or its counsel, concerning the North Range parcel in Laramie County, Wyoming which discusses or mentions whether CFIUS will or may not require any/all of the ten (10) data center buildings, the e-house building, any of the equipment in any/all of those ten data center

buildings or e-house building, and/or any of the site electrical and/or networking infrastructure to be physically removed from the North Range parcel (to comply with President Biden's May 13, 2024 Divestment Order).

Please send the requested documents and communications via email to pmurphy@wpdn.net by July 19, 2024 at 4:00 p.m. MDT.

RESPECTFULLY SUBMITTED this 12th day of July 2024.

BCB CHEYENNE LLC d/b/a
BISON BLOCKCHAIN,

Plaintiff

By:



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d/b/a Bison Blockchain*